Mr. Phil McKittrick
Polyfoam Packers Corporation
955 Woodland Avenue
Michigan City, IN 46360

Re: 091-13602
Second Administrative Amendment to
Part 70 091-7666-00079

Dear Mr. McKittrick:

Polyfoam Packers Corporation was issued a permit on October 14, 1999 for stationary polystyrene shape molding operations. A letter requesting the Minor Source Modification 091-12933-00079 be incorporated into their Part 70 permit was received on November 2, 2000. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (with new language in bold and old language stricken):

The new molding press is being added to Section A.2 as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

1) One (1) boiler, model number CB 700-250, fueled by natural gas, heat input rate is 10.5 MMBtu per hour and exhausting to stack S-1

2) Twenty-four (24) foam polystyrene storage silos with a total maximum storage capacity of 60,000 pounds.

3) One (1) polystyrene pre expander, model number 6000, rated at 1500 pounds per hour and exhausting to stack S-4.

4) One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-11.

5) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-14.

6) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-15.

7) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-16.

8) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-17.

9) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-18.

10) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-19.

11) One (1) pre expander, rated at 500 pounds per hour and exhausting to stack S-5.

12) One (1) # 2 pre expander, rated at 1500 pounds per hour, exhausting to stack S-6.

13) Two (2) molding presses, each rated at 150 pounds per hour, one exhausting to stack S-7 and the other press exhausting to stack S-8.

14) One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-12.

15) One (1) molding presses, model number 812, rated at 300 pounds per hour and exhausting to stack S-13.

16) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-20.

17) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.

18) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.

19) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.

20) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.

21) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.

22) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.

23) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

24) One (1) molding press, model number 1317, identified as P001,rated at 600 pounds per hour, and exhausting to stack S-28.

The new molding press is being added to the facility description in Section D.2 as follows:

Facility Description [326 IAC 2-7-5(15)]

Twenty-four (24) foam polystyrene storage silo with a maximum storage silo with a maximum storage capacity of 60,000 pounds.

One (1) polystyrene pre expander, model number 6000, rated at 1500 pounds per hour and exhausting to stack S-4.

One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-11.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-14.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-15.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-16.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-17.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-18.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-19.

One (1) pre expander, rated at 500 pounds per hour and exhausting to stack S-5.

One (1) # 2 pre expander, rated at 1500 pounds per hour, exhausting to stack S-6.

Two (2) molding presses, each rated at 150 pounds per hour, one exhausting to stack S-7 and the other press exhausting to stack S-8.

One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-12.

One (1) molding presses, model number 812, rated at 300 pounds per hour and exhausting to stack S-13.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-20.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

One (1) molding press, model number 1317, identified as P001,rated at 600 pounds per hour, and exhausting to stack S-28.

A new Condition D.2.4 has been added as follows:

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5] [326 IAC 8-1-6]

Any change or modification that will cause VOC emissions from the molding press identified as P001, to be equal to or greater than 25 tons per year shall require IDEM, OAM approval before such changes can take place.

The numbering of the existing D.2.4, D.2.5, D.2.6 conditions, and the title page was changed as a result of this addition.

The following changes were made to Condition D.2.5 (now re-numbered D.2.6) to require record keeping for the new molding press to show compliance with the new Condition D.2.4:

D.2.5**6** Record Keeping Requirements

(a) To document compliance with Condition**s** D.2.1 **and D.2.4**, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition**s** D.2.1 **and D.2.4**.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Lisa M. Wasiowich, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (973) 575-2555, ext. 3206 or dial (800) 451-6027, press 0 and ask for 3-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
LW-EVP
cc: File - LaPorte County
U.S. EPA, Region V
LaPorte County Health Department
Northwest Regional Office
Air Compliance Section Inspector Rick Reynolds
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT

Polyfoam Packers Corporation
955 Woodland Avenue
Michigan City, Indiana 46360

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T091-7666-00079	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: October 14, 1999

First Administrative Amendment 091-11627-00079	Pages Affected: 5, 6, 29, 30
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: January 18, 2000

First Minor Source Modification 091-12933-00079	Pages Affected: 3, 4, 6, 30, 31, 31a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Second Administrative Amendment 091-13602-00079	Pages Affected: 3, 4, 6, 30, 31, 31a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]
C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
C.16 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)]
C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection
C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - One boiler rated 10.5 MMBtu/hr

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.1.1 Particulate Matter (PM) [326 IAC 6-2-4]

Compliance Determination Requirements
D.1.2 Testing Requirements [326 IAC 2-7-6(1)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.1.3 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.1.4 Record Keeping Requirements [40 CFR part 60.48c]

D.2 FACILITY OPERATION CONDITIONS - Pre expanders and molding equipment

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.2.1 Prevention of Significant Deterioration [326 IAC 2-2 and 40 CFR 52.21]
D.2.2 New Facilities, General Reduction Requirements [326 IAC 8-1-6]
D.2.3 New Facilities, General Reduction Requirements [326 IAC 8-1-6]
D.2.4 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5] [326 IAC 8-1-6]

Compliance Determination Requirements
D.2.5 Testing Requirements [326 IAC 2-7-6(1)]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.2.6 Record Keeping Requirements
D.2.7 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS - One (1) boiler rated at 8.4 MMBtu/hr

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]

Compliance Determination Requirements
D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.3.3 Monitoring

Certification Form
Emergency/Deviation Occurrence Report
Part 70 Quarterly Report
Quarterly Compliance Monitoring Report

10) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-19.

11) One (1) pre expander, rated at 500 pounds per hour and exhausting to stack S-5.

12) One (1) # 2 pre expander, rated at 1500 pounds per hour, exhausting to stack S-6.

13) Two (2) molding presses, each rated at 150 pounds per hour, one exhausting to stack S-7 and the other press exhausting to stack S-8.

14) One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-12.

15) One (1) molding presses, model number 812, rated at 300 pounds per hour and exhausting to stack S-13.

16) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-20.

17) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.

18) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.

19) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.

20) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.

21) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.

22) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.

23) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

24) One (1) molding press, model number 1317, identified as P001, rated at 600 pounds per hour, and exhausting to stack S-28.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

1) One (1) boiler, model number CB 700-200, fueled by natural gas, heat input rate is 8.4 MMBtu per hour and exhausting to stack S-2.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

One (1) molding press, model number 1317, identified as P001, rated at 600 pounds per hour, and exhausting to stack S-28.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Prevention of Significant Deterioration [326 IAC 2-2 and 40 CFR 52.21]

Pursuant to CP 091-4823-00079, issued on March 29, 1996, the molding process shall use no more than 26.77 tons per month of pentane (VOC) (at 77.5% flash off). This usage limit is required to limit the potential to emit of VOC to 20.75 tons per month. Compliance with this limit makes the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21 not applicable.

D.2.2 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

Pursuant to CP 091-4823-00079, issued on March 29, 1996, the best available control technology (BACT) for the expandable polystyrene molding process shall be the use of the lowest available pentane content material without add-on control equipment. Also, the Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will fulfill the requests of 326 IAC 8-1-6.

D.2.3 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

BACT - The OAM, IDEM has determined the BACT for the pre expander, rated at 500 pounds per hour and # 2 pre expander, rated at 1500 pounds per hour shall be as follows:

(a) The molding compound shall contain a maximum average of 5.5% pentane.

(b) Polyfoam will continue to work with resin suppliers to seek to obtain resins with lower VOC content. Polyfoam will also continue to evaluate the alternate materials.

(c) The Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will fulfill the requests of 326 IAC 8-1-6.

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5] [326 IAC 8-1-6]

Any change or modification that will cause VOC emissions from the molding press identified as P001, to be equal to or greater than 25 tons per year shall require IDEM, OAM approval before such changes can take place.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.6 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1 and D.2.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.4.

(1) The amount and VOC content of expandable polystyrene molding compound. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) The total VOC usage for each month; and

(4) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(c) To document compliance with Condition D.2.3, the Permittee shall maintain records of the average monthly pentane content which shall be less than 5.5%.

D.2.7 Reporting Requirements

a) A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

b) To document compliance with Condition D.2.2 and D.2.3 the Permittee shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous years search, and schedule of switching material with lower pentane and VOC content if the material is available.